

707 Pleasant Valley Drive No. 15
Little Rock, AR 72227
501-258-6912
donald.johnson@eagle.com

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUL 13 2018 ★

LONG ISLAND OFFICE

Honorable J. Bianco & Magistrate Locke
United States District Court
100 Federal Plaza
Central Islip, New York 11722

July 10, 2018
Re: # CV-175253 (JFB)(SIL)
Kramer v Dane, et al. **RECEIVED**

JUL 13 2018

Dear Honorable J. Bianco and Magistrate Locke:

EDNY PRO SE OFFICE

Leagle, Inc. (Leagle) is responding to Plaintiff's letter to you of June 18, 2018 (copy attached) requesting a default judgement by resubmitting the original initial documents (File 59).

Leagle, Inc. did not respond earlier because it believed the Plaintiffs' two attempts to serve the Complaint on Leagle lacked essential elements necessary to establish the basis for general jurisdiction in a New York Court. The first attempt was by registered mail to our office in Little Rock, Arkansas and the second attempt to our agent for service of process in Delaware, both outside the state of New York.

Leagle, a Delaware corporation, and has never registered to do business in the state of New York and has never appointed a local agent for service of process. It has never maintained a place of business or owned property in New York, has never employed any person within New York, and has never derived revenue from New York; certainly, falling far short of the "essentially at home test" limiting the circumstances in which New York Courts may exercise general jurisdiction over a foreign corporation.

Content carried on our site is public information and is acquired from courts in all states and federal jurisdictions. The entirety of this information (over five million decisions) constitutes a set of documents held in the public domain, which collectively form an appellate record. We maintain this set of documents to serve the public in matters of legal research.

The decision in question (Kramer v Kramer, 2015 NY Slip Op 51142(U)) was downloaded directly from the New York State Law Reporting Bureau website soon after it was published on or about July 17, 2015. Leagle downloads approximately one thousand decisions a day and the download of this decision was made in the normal course of our business; no special treatment, collusion, intervention or deviation in our standard procedures. To our knowledge, the case has remained on the Bureau's website continuously since that time and can be accessed at
http://www.nycourts.gov/reporter/3dseries/2015/2015_51142.htm

Plaintiffs' Request for Certificate of Default filed April 16, 2018 (enclosed as an attachment to Plaintiff's letter to you of June 18, 2018 above) contends, in part, that Leagle defamed Plaintiff and Children, published false statements defaming minors based on hearsay. These contentions are untrue; Leagle provided information exactly as released by the Court to ensure the utility of this public domain resource. We do not manipulate the public domain resource.

Based upon the above, Leagle objects to the action of Douglas C. Palmer, Clerk of the United States District Court for the Eastern District of New York, in noting the default of defendant LEAGLE, INC. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure on May 17, 2018 (enclosed as an attachment to Plaintiff's letter to you of June 18, 2018 above). No basis for establishing general jurisdiction supporting the consideration of the Plaintiffs' Request for Certificate of Default was given. We do not believe any such support exists and request that the Clerk's notation of default be withdrawn and that Leagle be dismissed as a defendant in the case based upon lack of general jurisdiction.

Dated: Little Rock, Arkansas
July 10, 2018

LEAGLE, INC.
DONALD L. JOHNSON
CHIEF OPERATING OFFICER

By: *Donald L. Johnson*
DONALD L. JOHNSON

Temmi Kramer
1261 Central Ave #517
Far Rockaway, NY 11691
(516) 314-9895, Temmikramer12@gmail.com

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 21 2018 ★

LONG ISLAND OFFICE

Honorable J. Bianco & Magistrate Locke
United States District Court
100 Federal Plaza
Central Islip, New York 11722

June 18, 2018
Re: # CV-17 5253 (JFB)(SIL)
Kramer v Dane, et al.

Dear Honorable J. Bianco and Magistrate Locke,

Plaintiff's received the court certificate for default judgment against Leagle Inc. At this time, Plaintiffs are resubmitting the initial documents (File #81) along with a motion as the request was filed prematurely before receiving the certificate of default.

Plaintiffs request that [a] default judgment with sum certain be granted for each Plaintiff against defendant Leagle Inc. and [b] a court injunction be granted restraining Leagle Inc. from further publishing the Kramer decisions. The financial damages are irreversible. Plaintiffs intentionally are defamed, with false allegations in a sealed matrimonial action. Plaintiffs employment and academic opportunities have been restricted based upon this ongoing defamation.

Your attention to this matter is appreciated,

Temmi Kramer

Temmi

RECEIVED

JUN 21 2018

EDNY PRO SE OFFICE

CC:

LORI L. PACK
Attorney for the State of New York, Hon Edmund Dane

**Linda Mejias, Hon. Leonard Steinman, Hon. Lawrence Marks,
and Governor Andrew Cuomo
300 Motor Parkway Suite 205
Hauppauge, NY 11788**

BRIAN DAVIS ESQ.
**Law Office of Brian Davis
Attorneys for the Defendant Brian Davis and Lori Schlessinger
400 Garden City Plaza Suite 450
Garden City, NY 11530**

**L'abbate Balkan, Colavita, & Contini
Attorney for John Zenir ESQ.
1001 Franklin Ave
Garden City, NY 11530**

**NANCY SHERMAN ESQ.
1010 Northern Blvd. Suite 208
Great Neck, NY 11021**

**LEAGLE INC/LEAGLE.COM
707 Pleasant Valley Drive Unit 15
Little Rock, AR 72227**

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
TEMMI KRAMER,

Plaintiffs,

- against -

EDMUND DANE, et al.,

Defendants.

CLERK'S CERTIFICATE
OF DEFAULT
CV 17-5253 (JFB)(SIL)

I, Douglas C. Palmer, Clerk of Court for the United States District Court for the Eastern District of New York, do hereby certify that defendant LEAGLE, INC., has not filed an answer or otherwise moved with respect to the amended complaint, and that the time to answer or move has expired.

The default of defendant LEAGLE, INC., is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: Central Islip, New York
May 17, 2018

DOUGLAS C. PALMER
CLERK OF THE COURT

BY: /S/ JAMES J. TORITTO
DEPUTY CLERK

Case 2:17-cv-05253-JFB-SIL Document 59 Filed 04/16/18 Page 6 of 9 PageID #: 1978

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Temmi Kramer, K. Kramer, Z. Kramer, T. Kramer
minor, by custodial parent Temmi Kramer
KK as infant & guest in representation
Plaintiff(s),
-against-
_____ X

MOTION FOR
DEFAULT JUDGMENT

██████████)
17cv-05253

Leagle, Inc.
Defendant(s).

_____ X

Plaintiff Temmi Kramer, K. Kramer, Z. Kramer, T. Kramer hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of plaintiff and against defendant(s) Leagle, Inc. / Leagle, Inc. on the grounds that said defendant(s) failed to answer or otherwise defend against the complaint.

Dated: April 16, 2018

T. Kramer
(Signature)

TEMMI KRAMER
Print Name of Plaintiff Pro Se

1261 Central Ave
Address

Ap. 517 Far Rockaway, NY

11691

TO: (Put Name and Address of
Each Defendant(s) or Defense Attorney)

Leagle, Inc. / leagle.com
707 Pinesant Valley Drive
Unit 15
Little Rock, AR 72227

Case 2:17-cv-05253-JFB-SIL Document 59 Filed 04/16/18 Page 7 of 9 PageID #: 1979

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Temmi Kramer, K. Kramer, Z. Kramer, J. Kramer, SEK
as minors by custodial parent, Temmi Kramer,
RK as intent requiring representation

AFFIRMATION IN SUPPORT
OF MOTION FOR DEFAULT
JUDGMENT

Plaintiff(s)
-against-

17 CV- 05253

Edmund Dane, Et al

Defendant(s).

Temmi Kramer hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 55 (a).
3. The time for defendant(s), Leagle, Inc. / Leagle.com to answer or otherwise move with respect to the complaint herein has expired.
4. Defendant(s), Leagle, Inc. / Leagle.com, has not answered or otherwise moved with respect to the complaint, and the time for defendant(s) 1/17/2018 to answer or otherwise move has not been extended.

5. That defendant(s) Leagle, Inc. / Leagle.com default has been noted by the Clerk of Court. A copy of the Certificate is attached hereto.

6. Defendant(s) Leagle, Inc. / Leagle.com is indebted to plaintiff(s) in the following manner (state the facts in support of the claim(s)):
defamation of Plaintiff and children using minor real names from sealed matrimonial action, resulting in financial harm, academic hardship, loss of employment opportunities, sever and unrepairable

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damage Financially, socially, academically.
Defendant Published false statements defaming minors based on hearsay from a sealed case. ~~as it is confidential~~ ~~with intent to protect~~ Defendant published matrimonial decision on internet that went viral for world to see, causing irreversible harm + damage. Plaintiff request ^{sanc} injunction restraining Defendant from further publishing and removal of publications, forbidding Future publications that have caused sever harm and damage strategically conspired WHEREFORE, plaintiff Temmi Kramer and others requests that a default judgment be entered in favor of plaintiff Temmi Kramer, X Kramer, Z Kramer, J. Kramer, RK, Eagle Inc./Eagle. com and against defendant(s) Eagle Inc./Eagle. com by defendant.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, that no part thereof has been paid, and that the disbursements sought to be taxed have been made in this action or will necessarily be made or included in this action.

Dated: April 16, 2018

By: Temmi
(Signature)

Temmi Kramer
(Print name)

1261 Central Ave
(Address)

APT 517

Far Rockaway N.Y 11691

Case 2:17-cv-05253-JFB-SIL Document 59 Filed 04/16/18 Page 9 of 9 PageID #: 1981

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Temmi KRAMER, ^X
Temmi Kramer, ^X
Z Kramer, J Kramer, as minor
by CWTUDIAL Plaintiff(s), Plaintiff(s),
Temmi Kramer & K as infant, requesting representation
AFFIRMATION OF SERVICE

-against-

Edmund Done Et al.

17-cv-05253 ^X)

Defendant(s).

X

Ellen Laifer, declare under penalty of perjury that I have
served a copy of the attached Affirmation in support of motion for
upon Leagle, Inc (Leagle.com) ^{default} ^{Judgment}
by mailing it to Leagle Inc. / Leagle.com
707 Pleasant Valley Drive Little Rock AR

whose address is: 72227

Dated: April 16, 2018
Central Islip, New York

Ellen Laifer
Signature

6023 Central Ave
Address

Cedarkhurst NY 11516
City, State & Zip Code

League
Troy
Unit 15
Little Rock, AR 72227

3G RAZR JACKS
Central AR P&DC 722
TUE 10 JUL 2018 FM

JUL 13 2018

JUDGE ISLAND OFFICE

JUDGE'S OFFICE

★

Honorable J. Bianco + Magistrate
United States District Court
100 Federal Plaza
Central Islip, New York 11720